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November 11, 2019

VIA EMAIL

Hon. Elizabeth S. Stong
United States Bankruptcy Judge
Conrad B. Duberstein Courthouse
271-C Cadman Plaza East - Suite 1595
Brooklyn, New York 11201-1800

Re: *In re Korean Radio Broadcasting, Inc.*, 1-19-46322-ess

Dear Judge Stong:

We represent the alleged debtor, Korean Radio Broadcasting, Inc., in the above-captioned matter. This letter application seeks a telephonic conference tomorrow afternoon (Tuesday, November 12) with respect to enlargement of the alleged debtor's time to file a response to the involuntary petition filed by Multicultural Radio Broadcasting, Inc. ("MRBI").

Rule 9006(b) of the Bankruptcy Rules of Procedure provides, in the relevant portion, that "when an act is required . . . to be done at or within a specified period by these rules . . . , the court for cause shown may at any time in its discretion . . . with or without motion or notice order the period enlarged if the request is made before the expiration of the period originally prescribed" Pursuant to Rule 1011(b), defenses and objections to the petition "shall be filed and served within 21 days after service of the summons. . . ." Of course, the Rules of Civility of this Court further provide: "Upon request coupled with the simple representation by counsel that more time is required, the first request for an extension to respond to pleadings ordinarily should be granted as a matter of courtesy."

MRBI served the petition by mail on October 23, 2019. The alleged debtor's response is therefore due on or before November 13, 2019. On Friday, November 8, 2019, Young Kwon, the alleged debtor's principal, retained us to represent the alleged debtor in this matter. That afternoon, my partner Brian Hall and I telephoned Douglas Pick, counsel for MRBI, to request an enlargement of time to respond to the petition. (Mr. Hall is a partner in our Atlanta office who practices primarily bankruptcy law while my practice primarily commercial litigation with some bankruptcy.) Mr. Pick indicated that he had to get approval from California and asked

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that Mr. Hall send him an e-mail request he could forward. MRBI's lawyer in California (MRBI is located in New York) said no because our firm had represented the alleged debtor in a trial in New Jersey state court in February.

As an initial matter, Mr. Hall had no involvement in the New Jersey action or in any other way for the alleged debtor prior to last week. While Mr. McCarthy served as trial counsel to the alleged debtor in February, SGR ceased representing the alleged debtor in May 2019.

Moreover, we understand that a lot has happened since we ceased representing the alleged debtor. A petition for an assignment for the benefit of creditors with respect to the alleged debtor was filed in NY Supreme Court for Queens County by Assignee William A. Brandt, Jr. of Development Specialists, Inc. under Index Number 716083/2019. We have not appeared in that proceeding and were not served with any of the documents filed therein. According to the online docket, MRBI has appeared and filed papers in that action, including discovery demands of some sort. We understand from Mr. Pick that MRBI is the sole creditor of the alleged debtor. We need some time to review the documents filed in the ABC petition, consult with our client concerning the unique issues relating to the involuntary proceeding and conduct appropriate research with respect to the applicable law for both proceedings.

We respectfully request a telephonic conference on the afternoon of Tuesday, November 12 concerning the possibility of an enlargement of the alleged debtor's time to respond to the involuntary petition.

Respectfully yours,



John G. McCarthy

cc: Alan J. Pick, Esq.
Brian P. Hall, Esq.